

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EUFEMIA GUILLEN,

Plaintiff,

vs.

B.J.C.R. L.L.C., a Nevada Limited Liability Company; B.J.H.S., LLC., a Nevada Limited Liability Company; R.C.S.J., LLC, a Nevada Limited Liability Company; Dhilan One L.L.C., a Nevada Limited Liability Company; CHAMPAK LAL, an Individual; and BHARAT B. LAL, an Individual,

Defendants.

Case No.: 3:20-cv-317-ART-CSD

ORDER GRANTING

**STIPULATION
TO STAY PENDING DEADLINES AND
SUBMIT DISPUTE TO MAGISTRATE
JUDGE
[First Request]**

Plaintiff Eufemia Guillen (“Plaintiff” or “Guillen”) and Defendants B.J.C.R. L.L.C., B.J.H.S., LLC., R.C.S.J., LLC, CHAMPAK LAL, and BHARAT B. LAL (collectively “Defendants”), by and through their respective counsel, hereby stipulate and request a stay of all pending deadlines so the parties can submit a settlement dispute that has recently arisen. Specifically, Defendants contend that the parties agreed to the material terms of a settlement while Plaintiff disputes the existence of a settlement based on no final form of agreement has yet been reached. Therefore, the parties wish to present their respective positions to the Magistrate Judge to aid in resolving the dispute and reaching final resolution of the case.

The currently pending deadlines in this case are as follows:

- March 14, 2025 – deadline to file motions in limine;
- March 28, 2025 – deadline to respond to motions in limine;

- 1 • April 7, 2025, at 11:00 a.m. – calendar call;
2 • April 14, 2025 – deadline to exchange exhibits;
3 • April 21, 2025 – deadline to electronically file exhibit lists, witness lists, jury instructions,
4 voir dire questions, joint statement of the case, and civil trial briefs;
5 • April 28, 2025 - trial

6 The parties strongly believe they will be able to finalize a settlement with the assistance of
7 the Magistrate Judge and will therefore likely avoid the need for trial. In the interim, the parties
8 wish to avoid incurring additional fees and costs in preparation for the trial, which impedes the
9 parties' ability to finalize a resolution and proceed with dismissal of the case. This is the first request
10 for a stay of all pending deadlines, which is made in good faith and is not for the purpose of delay.

11 Accordingly, the parties stipulate and respectfully request that the Court stay all pending
12 deadlines and order the parties to submit their dispute to the Magistrate Judge for further assistance
13 in determining final settlement terms.

14 DATED this 12th day of March 2025.

15 DATED this 12th day of March 2025.

16 KEMP & KEMP, ATTORNEYS AT LAW

17

s/ James P. Kemp *s/ Sandra C. Ketner*

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21 **ORDER**

22 IT IS SO ORDERED.

23 DATED this 13th day of March, 2025.

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ANNE R. TRAUM
26 UNITED STATES DISTRICT